

1 LYSSA S. ANDERSON  
Nevada Bar No. 5781  
2 KRISTOPHER J. KALKOWSKI  
Nevada Bar No. 14892  
3 TRAVIS C. STUDDARD  
Nevada Bar No. 16454  
4 KAEMPFER CROWELL  
1980 Festival Plaza Drive, Suite 650  
5 Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
6 Fax: (702) 796-7181  
[landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
7 [kkalkowski@kcnvlaw.com](mailto:kkalkowski@kcnvlaw.com)  
[tstuddard@kcnvlaw.com](mailto:tstuddard@kcnvlaw.com)

8 *Attorneys for Defendant*  
9 *Angie Santos and the Las Vegas*  
10 *Metropolitan Police Department*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 KRISTINA KERLUS, individually,

14 Plaintiff,

15 vs.

16 DR. JENNIFER CORNEAL, in her individual  
17 capacity; A. SANTOS, in her individual  
18 capacity; CITY OF LAS VEGAS, a Municipal  
19 corporation; and COUNTY OF CLARK, a  
20 Municipal corporation; LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT,  
jointly and severally

21 Defendants.

Case No.: 2:24-cv-02352-APG-DJA

**DEFENDANT LVMPD'S MOTION TO  
DISMISS**

22 Defendant Las Vegas Metropolitan Police Department ("LVMPD") moves under Federal  
23 Rule of Civil Procedure 12(b)(5) for dismissal based on failure to timely serve LVMPD with  
process.

24 Alternatively, LVMPD moves under FRCP 12(b)(6) for dismissal of Plaintiff Kristina

1 Kerlus’s “Count VI” and “Count VII” in the First Amended Complaint against LVMPD.

2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3 **I. INTRODUCTION**

4 **Motion to Dismiss under FRCP 12(b)(5):** Plaintiff filed this lawsuit against several  
5 defendants, including LVMPD, as listed in the First Amended Complaint. But she did not serve  
6 LVMPD with a summons and copy of her pleading until May 14, 2025—well beyond the required  
7 ninety-day service of process deadline imposed by Federal Rule of Civil Procedure 4 and after the  
8 Court’s first given extension of time to complete service expired.

9 She has not shown good cause or excusable neglect to support a second extension of the  
10 deadline to complete service against LVMPD. As a result, Rule 4 authorizes the Court to dismiss  
11 LVMPD based on Plaintiff’s failure to timely complete service of process.

12 **Motion to Dismiss under FRCP 12(b)(6):** If the Court does not dismiss LVMPD based  
13 on untimely service under FRCP 4, the Court should dismiss LVMPD with prejudice as to  
14 Plaintiff’s “Count VII” for malicious prosecution under Nevada state law. The Court should also  
15 dismiss Plaintiff’s “Count VI” brought under federal law directly against LVMPD.

16 The Court should dismiss Count VII with prejudice as to LVMPD because of Nevada  
17 Revised Statute 41.036. NRS 41.036 required Plaintiff to provide LVMPD with notice of this  
18 claim within two years of the claim’s accrual date. This claim accrued on December 19, 2022 (at  
19 the latest) when all criminal charges against her were dismissed. But she did not provide LVMPD  
20 with notice of her intent to bring civil claims against LVMPD until 2025. Accordingly, NRS  
21 41.036 bars this claim as a matter of law.

22 Further, the Court should dismiss Count VI against LVMPD because her supporting  
23 allegations consist of only conclusory, generalized statements that do not plausibly establish this  
24 federal cause of action.

## II. BACKGROUND

LVMPD is concurrently filing a Response to Plaintiff's Motion, (ECF No. 40), seeking a second extension of time to serve LVMPD with process. LVMPD's Response includes a Background section discussing the relevant history of this case. Rather than unnecessarily repeat content, and for easier review by the Court, LVMPD incorporates that Background into this Motion to Dismiss.

## III. ARGUMENT

### A. The Court Should Dismiss LVMPD Because Plaintiff Did Not Timely Serve LVMPD with Process and Plaintiff Does Not Establish Good Cause or Excusable Neglect to Earn Another Extension of Time to Complete Service.

Alongside this Motion to Dismiss, LVMPD filed its Response opposing Plaintiff's request for a second extension of time to serve LVMPD with process. LVMPD's Response addresses how Plaintiff did not timely serve LVMPD and has not satisfied the applicable standards of good cause or excusable neglect to receive another extension of time to do so. In accord with FRCP 4(m), the Court should dismiss LVMPD, not just quash Plaintiff's untimely and unpermitted service attempt dated May 14, 2025. (Summons Returned Executed, ECF No. 42) (noting an attempt to serve LVMPD on May 14, 2025); *see Williams v. Bellagio Hotel & Casino*, 728 F. Supp. 3d 1166, 1169 (D. Nev. 2024) ("If a plaintiff is unable to satisfy her burden of establishing that service was valid, the court has the discretion to either dismiss the action or retain it and quash service.").

### B. Nevada Revised Statute 41.036 Bars Plaintiff's Count VII from Proceeding against LVMPD Because Plaintiff Did Not Notify LVMPD of Her Intent to Bring This Claim Within Two Years of the Claim's Accrual Date.

If the Court does not dismiss LVMPD based on insufficient service of process, the Court should dismiss LVMPD from Plaintiff's First Amended Complaint under FRCP 12(b)(6) because her two claims against LVMPD fail at this stage.

The first basis for dismissal under FRCP 12(b)(6) concerns Plaintiff's Count VII. The label

1 to Count VII names “Dr. Corneal” (a Clark County employee) and “Santos” (an LVMPD  
 2 employee). However, this claim necessarily proceeds against LVMPD because Plaintiff seeks  
 3 “respondeat superior” liability against LVMPD for all state law torts committed by its employees  
 4 (i.e. Defendant Santos).

5 To proceed with this Nevada state law cause of action against LVMPD, Plaintiff had to  
 6 first comply with Nevada Revised Statute 41.036. *Guillory v. Las Vegas Metro. Police Dep’t*, No.  
 7 2:23-CV-2010 JCM (BNW), 2025 U.S. Dist. LEXIS 43590, at \*8 (D. Nev. Mar. 10, 2025). NRS  
 8 41.036 required Plaintiff to provide LVMPD’s “governing body” with notice of her intent to  
 9 pursue a civil claim against it. Nev. Rev. Stat. 41.036(2). This statute mandated a specific time to  
 10 accomplish the mandatory notice: within two years of her claim’s accrual date. *Id.*

11 Here, Plaintiff did not comply with NRS 41.036. Count VII arguably accrued at the latest  
 12 on December 19, 2022, when all criminal charges against her were dismissed. But she did not  
 13 provide LVMPD with any notice of her intent to bring a claim against it until more than two years  
 14 later—when eventually delivering a copy of her First Amended Complaint and summons to  
 15 LVMPD on May 14, 2025. **Ex. A**, Decl. Marleen Srok (declaring that LVMPD did not receive any  
 16 written correspondence from Plaintiff or her counsel within two years after December 19, 2022,  
 17 to notify LVMPD of Plaintiff’s intent to assert civil claims against it).

18 NRS 41.036 therefore bars Plaintiff’s “Count VII” from proceeding against LVMPD as a  
 19 matter of law. *See White v. Leavitt*, No. 2:18-cv-00008-JAD-BNW, 2023 U.S. Dist. LEXIS 16728,  
 20 at \*4 (D. Nev. Feb. 1, 2023).

21 **C. Plaintiff’s First Amended Complaint Does Not Plausibly Allege a *Monell***  
 22 **Claim against LVMPD Because the Supporting Allegations Amount to Only**  
**Conclusory Statements.**

23 The next basis for dismissal under FRCP 12(b)(6) concerns Plaintiff’s “*Monell*” claim  
 24 against LVMPD in “Count VI.” (First Am. Compl. ¶¶ 96–105, ECF No. 7). This claim proceeds

1 directly against LVMPD under 42 U.S.C. § 1983. *See Monell v. Dep't of Soc. Servs. of City of New*  
 2 *York*, 436 U.S. 658 (1978).

3 This is a “difficult” type of claim to bring, because it cannot proceed against LVMPD  
 4 “solely because [LVMPD] employs a tortfeasor.” *Bell v. Williams*, 108 F.4th 809, 824 (9th Cir.  
 5 2024); *Monell*, 436 U.S. at 691 (explaining that “a municipality cannot be held liable under § 1983  
 6 on a *respondeat superior* theory”) (emphasis in original). Rather, the essential requirement with  
 7 Plaintiff’s *Monell* claim is that her allegations must plausibly show how LVMPD had *policies*,  
 8 *customs*, or *procedures* that caused the at-issue violation of her constitutional rights.

9 Stated differently, Plaintiff’s allegations must plausibly show not only an unconstitutional  
 10 “policy or custom” within LVMPD itself but also a “direct causal link” between that specific policy  
 11 or custom and unlawful actions by officer(s) involved with Plaintiff. *Id.* at 824 (explaining that  
 12 liability “based on a *Monell* theory of liability is difficult,” and a municipality can be liable only  
 13 “when its own customs or policies cause a constitutional tort”).

14 Three elements make up a *Monell* legal theory as to LVMPD: (1) an LVMPD official  
 15 violated Plaintiff’s constitutional rights; (2) LVMPD had unconstitutional customs or policies; (3)  
 16 these customs or policies were the “moving force” behind the acting official’s violation of  
 17 Plaintiff’s constitutional rights. *Lockett v. Cty. of L.A.*, 977 F.3d 737, 741 (9th Cir. 2020)<sup>1</sup>; *Cadeaux*  
 18 *v. Las Vegas Metro. Police Dep’t*, 646 F. Supp. 3d 1312, 1327 (D. Nev. 2022) (emphasis added).

19 With the third element in the context of a non-life-threatening decision, a policy or

20 \_\_\_\_\_  
 21 <sup>1</sup> *Lockett* lists four elements to a *Monell* claim: “(1) he was deprived of a constitutional right; (2)  
 22 the municipality had a policy; (3) the policy amounted to deliberate indifference to Lockett’s  
 23 constitutional right; and (4) the policy was the moving force behind the constitutional violation.”  
 24 *Lockett v. Cty. of L.A.*, 977 F.3d 737, 741 (9th Cir. 2020). The three-element test identified in this  
 Motion consolidates the second and third elements from *Lockett*. This consolidation more easily  
 shows how the core focus of a *Monell* claim is that the alleged violation of the plaintiff’s  
 constitutional rights must have been because of already-in-place unconstitutional policies,  
 customs, or procedures within the municipality (here, LVMPD).

1 procedure can only be the “moving force” behind LVMPD officers’ actions if the policy or  
 2 procedure was already in place when Plaintiff’s alleged injury (her arrest) occurred. Courts in the  
 3 Ninth Circuit recognize that it is illogical and legally erroneous to use a plaintiff’s lone incident to  
 4 believe that an entire municipality had unconstitutional policies or procedures that guided the  
 5 acting officials’ misconduct. *Benavidez v. Cty. of San Diego*, 993 F.3d 1134, 1155 (9th Cir. 2021)  
 6 (“Where, as here, the County employees are not making life-threatening decisions, and because  
 7 micromanaging of municipal policies should be avoided, the single incident exception is  
 8 inapplicable.”) (internal quotation omitted).

9 In terms of showing “customs,” “policies,” or “procedures,” there are four ways to do so:  
 10 (a) identifying an official written policy that, on its face, compels unconstitutional conduct; (b)  
 11 showing that there are widespread unconstitutional practices similar to what Plaintiff allegedly  
 12 suffered, which constitute “a pervasive custom or practice” within LVMPD; (c) identifying  
 13 specific ways that LVMPD failed “to train, supervise, or discipline” its officers on constitutional  
 14 conduct; or (d) identifying a “decision or act by a final policymaker” of LVMPD to violate the  
 15 Constitution. *E.g. White v. Flathead Cnty.*, 680 F. Supp. 3d 1211, 1215 (D. Mont. 2023). For  
 16 purposes of the last method, the “final policymaker” for LVMPD is its Sheriff. *Hill v. Las Vegas*  
 17 *Metro. Police Dep’t*, 197 F. Supp. 3d 1226, 1234 (D. Nev. 2016), *aff’d*, 705 F. App’x 616 (9th Cir.  
 18 2017).

19 Here, Plaintiff’s proposed First Amended Complaint uses only conclusory allegations  
 20 alongside broad legal standards in an attempt to support the *Monell* claim against LVMPD. Courts  
 21 in this District have consistently rejected such a conclusory effort by dismissing the claim.

22 **1. Plaintiff’s Allegations Do Not Allege Unconstitutional Written Policies**  
 23 **or Procedures.**

24 Plaintiff’s First Amended Complaint does not allege that LVMPD had an official, written

1 policy mandating that officers commit the allegedly unconstitutional conduct against Plaintiff.  
2 Accordingly, this theory of a *Monell* claim is not at issue in this case.

3 Her *Monell* theories appear to be about ratification of unconstitutional conduct by LVMPD  
4 policymakers, inadequate training causing the allegedly unconstitutional conduct, or widespread  
5 unconstitutional practices that were the moving force for the allegedly unconstitutional conduct  
6 against Plaintiff. As discussed below, she does not plausibly allege any of these theories.

7  
8 **2. *Plaintiff's Allegations Do Not Plausibly Show Ratification of Unconstitutional Conduct.***

9 Plaintiff cannot plausibly allege a *Monell* theory of ratification by using just broad  
10 statements that LVMPD did not take disciplinary or supervisory action against its officers. But,  
11 here, that is all Plaintiff's First Amended Complaint presents. It therefore fails to plausibly allege  
12 this theory. *Victory v. Henderson, NA. P.D.*, No. 2:23-cv-02086-CDS-NJK, 2024 U.S. Dist. LEXIS  
13 156454, at \*4-5 (D. Nev. Aug. 29, 2024) (“[A]lthough the second amended complaint includes  
14 unelaborated assertions that the investigation was ‘inadequate,’ and not ‘proper[],’ such ‘labels  
15 and conclusions’ fail to allege that the investigation conducted suffices as a ratification of any  
16 alleged wrongdoing by the police officers”).

17 As the Ninth Circuit has stated, “[t]o hold cities liable under section 1983 whenever  
18 policymakers fail to overrule the unconstitutional discretionary acts of subordinates would simply  
19 smuggle *respondeat superior* liability into section 1983.” *Weisbuch v. Cnty. of Los Angeles*, 119  
20 F.3d 778, 781–82 (9th Cir. 1997) (citation and internal quotation marks omitted); *accord Gillette*  
21 *v. Delmore*, 979 F.2d 1342, 1348 (9th Cir. 1992). The Ninth Circuit therefore requires “something  
22 more” than a mere failure to reprimand at-issue conduct after an incident. *E.g. Kanae v. Hodson*,  
23 294 F. Supp. 2d 1179, 1189 (D. Haw. 2003); *Cole v. Doe 1 thru 2 Officers of City of Emeryville*  
24 *Police Dept.*, 387 F. Supp. 2d 1084, 1099-1101 (N.D. Cal. 2005) (concluding that ratification

cannot be established through “deliberate indifference towards a single after-the-fact investigation”). Plaintiff’s First Amended Complaint does not contain that “something more” to support a ratification theory at the pleadings stage.

### 3. *Plaintiff’s Allegations Do Not Plausibly Show Unconstitutional Training of Officers.*

Next, Plaintiff’s allegations reference LVMPD failing to “adequately train” officers. This type of a *Monell* claim about training “usually requires” a plaintiff to show “[a] pattern of similar constitutional violations by untrained employees.” *Martinez v. L.A. Police Dep’t*, No. 22-15509, 2024 U.S. App. LEXIS 18354, at \*2 (9th Cir. July 25, 2024).

In other words, Plaintiff cannot create a plausible *Monell* claim merely by mentioning her own arrest and broadly stating that the alleged misconduct during arrest came from a deficient training program within LVMPD. Rather, there must be allegations that plausibly establish how LVMPD had prior notice that officers were previously violating citizens’ rights and, thus, additional training was required to avoid that result in recurring situations but was not implemented. *Benavidez v. Cty. of San Diego*, 993 F.3d 1134, 1154 (9th Cir. 2021) (“[T]hat a particular officer may be unsatisfactorily trained will not alone suffice to fasten liability on the city, for the officer’s shortcomings may have resulted from factors other than a faulty training program.”).

Here, Plaintiff does not allege any prior instances before her own arrest where officers drafted arrest warrants with knowingly false information and, despite that recurring behavior, LVMPD failing to implement necessary training practices to prevent future violations. Plaintiff’s First Amended Complaint contains only conclusory allegations stating that LVMPD employed a deficient training program. That effort is not enough to state a plausible claim. *Williams v. Las Vegas Metro. Police Dep’t*, No. 2:16-cv-3020-APG-VCF, 2019 U.S. Dist. LEXIS 12878, at \*14



1 (D. Nev. Jan. 25, 2019) (“[M]erely alleging that the existing training program is inadequate for a  
2 class of employees, such as police officers, is not sufficient to state a claim”).

3 Moreover, Plaintiff may be trying to rest her *Monell* claim on the theory that LVMPD  
4 outright failed to train officers to not make deliberately false statements in an arrest warrant or  
5 police report that will be used by prosecutors and judges. (First Am. Compl. ¶ 98, ECF No. 7).  
6 When considering *Flores v. Cty. of L.A.*, 758 F.3d 1154 (9th Cir. 2014), and later precedent, this  
7 theory fails as a matter of law because a *Monell* claim is not viable by simply alleging that a city  
8 failed to train officers to not engage in clearly illegal action.

9 In *Flores*, the court considered a *Monell* claim alleging inadequate training due to the  
10 “absence of language in the Sheriff’s Department Manual that would instruct deputies not to  
11 sexually harass or sexually attack women with whom they come into contact.” *Id.* at 1160. The  
12 court rejected this theory because the law does not require a municipal organization to have a  
13 written policy or training program instructing officers to not perform obviously illegal conduct. *Id.*  
14 (“Where the proper response . . . is obvious to all without training or supervision, then the failure  
15 to train or supervise is generally not ‘so likely’ to produce a wrong decision as to support an  
16 inference of deliberate indifference by city policymakers to the need to train or supervise.”).

17 Because every officer would inherently know not to perform obviously illegal actions of  
18 sexually harassing women, the court held that a *Monell* claim cannot exist merely because an  
19 agency did not have a policy or manual explicitly saying so. *Id.* This result matches precedent  
20 logically explaining that a law enforcement agency cannot realistically have a policy expressly  
21 prohibiting every type of conduct that might happen. *See, e.g., Calhoun v. Ramsey*, 408 F.3d 375,  
22 380 (7th Cir. 2005) (“No government has, or could have, policies about virtually everything that  
23 might happen.”).

24 Here, it is inherently obvious to all citizens—and certainly law enforcement officers—that

1 it violates the law to submit false statements to a court in order to secure an arrest. Accordingly,  
 2 Plaintiff cannot support her *Monell* claim against LVMPD based on a broad statement that  
 3 LVMPD did not have a policy expressly training officers to not commit perjury when performing  
 4 their duties of seeking arrests. Dismissal is particularly correct here because her allegations do not  
 5 identify any prior incidents of such misconduct by officers that would have warranted a policy  
 6 expressly instructing officers not to engage in such obviously unlawful conduct.

7 **4. *Plaintiff's Allegations Do Not Plausibly Show Widespread***  
 8 ***Unconstitutional Practices within LVMPD Similar to What Plaintiff***  
 9 ***Allegedly Suffered.***

10 Finally, Plaintiff's *Monell* claim appears to invoke a theory of widespread unconstitutional  
 11 conduct like what she allegedly experienced. To plausibly allege this theory, the allegations must  
 12 show "persistent and widespread" unconstitutional practices by LVMPD officials "similar" to  
 13 what Plaintiff suffered. *Hyun Ju Park v. City & Cnty. of Honolulu*, 952 F.3d 1136, 1142 (9th Cir.  
 14 2020) ("Alternatively, if the policy is not obviously, facially deficient, a plaintiff must ordinarily  
 15 point to a pattern of prior, similar violations of federally protected rights, of which the relevant  
 16 policymakers had actual or constructive notice.").

17 This type of *Monell* theory is actionable only if Plaintiff's allegations identify enough prior  
 18 incidents of unconstitutional action that the Court can plausibly view such conduct as so "persistent  
 19 and widespread" that it constituted a "permanent and well settled city policy." *Trevino v. Gates*,  
 20 99 F.3d 911, 918 (9th Cir. 1996). In other words, the unconstitutional conduct must have occurred  
 21 for a "sufficient duration, frequency and consistency that the conduct has become a traditional  
 22 method of carrying out policy." *Id.*

23 Here, Plaintiff does not identify or discuss any prior incident where other persons suffered  
 24 allegedly unconstitutional practices by LVMPD officers similar to what allegedly occurred to her.  
 For that reason, she has not plausibly alleged a *Monell* claim under the theory that LVMPD

officials operated under a “de facto” custom or policy of unlawful fabrication of statements in a warrant to support arrests. Her conclusory allegations mentioning the words “custom” and “policy” are not enough to proceed with a *Monell* claim at this stage. *O’Neal v. Las Vegas Metro. Police Dep’t*, No. 2:17-cv-02765-APG-GWF, 2018 U.S. Dist. LEXIS 145237, at \*12-13 (D. Nev. Aug. 27, 2018) (characterizing as conclusory the plaintiffs allegations that LVMPD has policies to “tolerate and allow the unlawful arrests of citizens,” to “tolerate unreasonable search and seizure,” to “tolerate the unlawful theft of citizens[‘] money and property,” and to “tolerate cruel and unusual punishment including the denial of medical attention.”).<sup>2</sup>

#### IV. CONCLUSION

For the reasons stated above, the Court should dismiss LVMPD from this case in full because Plaintiff did not timely serve LVMPD with process. Additionally, the Court should dismiss the claims asserted against LVMPD because Nevada law bars Plaintiff’s “Count VII” as a matter of law and Plaintiff’s allegations do not plausibly support “Count VI.”

DATED this 27th day of May, 2025.

KAEMPFER CROWELL

By: /s/ Lyssa S. Anderson

LYSSA S. ANDERSON (Nevada Bar No. 5781)

KRISTOPHER J. KALKOWSKI (Nevada Bar No. 14892)

TRAVIS C. STUDDARD (Nevada Bar No. 16454)

1980 Festival Plaza Drive, Suite 650

Las Vegas, Nevada 89135

***Attorneys for Defendants Angie Santos and the Las Vegas Metropolitan Police Department***

#### Index of Exhibits

Ex. A - Declaration of Marleen Srok

<sup>2</sup> See also *Guarino v. Las Vegas Metro. Police Dep’t*, No. 2:13-cv-02135-GMN-NJK, 2014 WL 12791070, at \*4 (D. Nev. July 21, 2014); *Anderson v. L.V. Metro. Police Dep’t*, No. 2:24-cv-01162-APG-DJA, 2025 U.S. Dist. LEXIS 20506, at \*28 (D. Nev. Feb. 4, 2025) (“To the extent Anderson is relying on her own alleged experiences to support her claim, a single incident is insufficient to show a widespread custom or practice.”).

**CERTIFICATE OF SERVICE**

I certify that I am an employee of KAEMPFER CROWELL, and that on the date below, I caused the foregoing **DEFENDANT LVMPD'S MOTION TO DISMISS** to be served via CM/ECF and/or First Class Mail (where indicated) addressed to the following:

Antonio M. Romanucci  
Patrick Driscoll  
ROMANUCCI & BLANDIN  
321 North Clark St., Ste. 900  
Chicago, IL 60654  
Phone: 312-458-1000  
Fax: 312-458-1004  
[aromanucci@rblaw.net](mailto:aromanucci@rblaw.net)  
[patrickdriscoll7@gmail.com](mailto:patrickdriscoll7@gmail.com)

*Attorneys for Plaintiff*

Robert W. Freeman  
Frank A. Toddre, II  
E. Matthew Freeman  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 S. Rainbow Blvd., Ste. 600  
Las Vegas, Nevada 89118  
Telephone: 702.893.3383  
Facsimile: 702.893.3789  
[Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
[Frank.Toddre@lewisbrisbois.com](mailto:Frank.Toddre@lewisbrisbois.com)  
[Matt.Freeman@lewisbrisbois.com](mailto:Matt.Freeman@lewisbrisbois.com)

*Attorneys for Defendants*  
*Dr. Jennifer Corneal and County of Clark*

Paul S. Padda  
Ravi Chanderraj  
PAUL PADDA LAW  
4560 South Decatur Blvd., Ste. 300  
Las Vegas, NV 89103  
Phone: (702) 366-1888  
Fax: 702-366-1940  
Email: [psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)  
Email: [rchanderraj@paulpaddalaw.com](mailto:rchanderraj@paulpaddalaw.com)

*Attorneys for Plaintiff*

Wolfgang Mueller  
MUELLER LAW FIRM  
41850 W. 11 Mile Rd., Ste 101  
Novi, MI 48375  
Phone: 248-459-9653  
Fax: 248-347-6630  
[wolf@wolfmuellera.com](mailto:wolf@wolfmuellera.com)

*Attorneys for Plaintiff*

*(Via U.S. Mail)*

DATED this 27th day of May, 2025.

/s/

an employee of Kaempfer Crowell